

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

Ana R. Olivella Rivera
PLAINTIFF

Vs.

Popular Leasing and Rental, Inc.,
and others.

DEFENDANTS

Civil No. 98-2267

**CREDIT COLLECTION
DAMAGES**

MOTION REQUESTING ADDITIONAL TIME

TO THE HONORABLE COURT:

COMES NOW Plaintiff through the undersigned attorneys and respectfully alleges and prays:

1. In the last two (2) days (March 21 and 22), undersigned was before a settlement conference before this Honorable Court in the case from Wanda Vargas Cabán vs. CTS, Case No: 02-1902. He represented the Plaintiff Wanda Vargas.

2. The same was heard before Honorable Cammille Vélez Rivé in these two (2) days. In the first day (21st), the hearing commence on or around 2:00PM and lasted until almost 7:00PM. A post conference hearing was held with Attorney Dennis Simonpietri, co-counsel for Plaintiff. The same lasted almost until 10:00PM.

3. The second day (March 22), undersigned again appear but around 2:15PM after a morning a deposition in case of Loyda Torres vs. ONDEO, civil case number 04-1948.

4. The settlement conference lasted until part 7:00PM. However, the case was favorably resolve by stipulation before Honorable Magistrate Judge Cammille Vélez.

5. Undersigned's energies are really vanquished; plus the fact that undersigned was left with no choice to appear before Honorable Vélez, in order to resolve the Vargas's case which was schedule to commence its jury trial on Monday, March 27, 2006, and last for two weeks. The Vargas's case is extremely complex, voluminous and an issue of first impression before the First Circuit. See the first opinion and order of Honorable Judge García which favored Plaintiff.

6. Humbly, it is respectfully requested the mercy of this Honorable Court for undersigned is extremely tired and exhausted; and prays the discretion of the Honorable Court to finalize the opposition under Rule 56.

7. However, both the Plaintiff's memorandum and statement of facts have been almost 90% completed but it could not be finalized under

these stressful personal condition encountered by undersigned in last two days. This is also known by Attorney Otero who coincided this morning before a local case at the Superior Court in Caguas, Puerto Rico.

8. Undersigned begs a continuance or extension until Wednesday 29, 2006, and most respectfully prays for said continuance order.

RESPECTFULLY REQUESTED.

I CERTIFY that on this same date I have filed with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following: Attorney Ana María Otero and Attorney David López Pumarejo, at P.O. Box 195351, San Juan, PR 00919-5351 by regular mail.

In Caguas, Puerto Rico, this March 23, 2006.

/RAFAEL A. OLIVERAS LOPEZ DE VICTORIA
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